

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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JOSHUA J. BELOW, by his Guardian,  
DEBRA BELOW, CHARLIE  
ELIZABETH BELOW and  
PATRICK JOSHUA BELOW, et al.

Case No: 15-cv-00529-wmc

Plaintiffs,  
and

DEAN HEALTH PLAN, INC.,

Involuntary Plaintiff,  
and

STAR BLUE BELOW-KOPF by her  
Guardian ad Litem, Teresa K. Kobelt,

Intervening Plaintiff,  
-vs-

YOKOHAMA TIRE CORPORATION,  
ABC INSURANCE COMPANY, YOKOHAMA  
CORPORATION OF AMERICA, DEF INSURANCE  
COMPANY, YOKOHAMA CORPORATION OF  
NORTH AMERICA, GHI INSURANCE COMPANY,  
YOKOHAMA TIRE MANUFACTURING  
VIRGINIA, LLC, JKL INSURANCE COMPANY,  
YOKOHAMA RUBBER COMPANY, LTD. and  
MNO INSURANCE COMPANY,

Defendants.

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**YOKOHAMA DEFENDANTS' RULE 26(a)(3) DISCLOSURES**

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COMES NOW Defendants Yokohama Tire Corporation, Yokohama Rubber Company, Yokohama Corporation of America, Yokohama Tire Manufacturing Virginia, LLC and Yokohama Corporation of North America (collectively hereafter referred to as "Defendants"), and hereby submits the following Federal Rule of Civil Procedure 26(a)(3) disclosures:

## **WITNESS LIST**

Pursuant to Rule 26(a)(3)(A)(i), Defendants hereby submit the name, address and telephone number of each witness that Defendants expect to present and those Defendants may call if the need arises. Defendants reserve the right to supplement or amend this list based upon any rulings of the court.

This identification of the witnesses below does not represent a certification of the witness' availability or that the witness is subject to the control of Defendants.

Defendants expect to present the following witnesses.

Name	Address
Officer Chad Thompson (if available or by deposition)	Wisconsin State Patrol 23928 Lester McMullen Drive Tomah, WI 54660-5376 (608) 374-0513
Scott Stoffel (if available or by deposition)	605 Scott Street Oregon, WI 53575
Joshua Below	5021 Netherwood Rd. Oregon, WI 53575
Molly Shoup	5021 Netherwood Rd. Oregon, WI 53575
Debra Below	390 Nygaard Oregon, WI 53575
John Below	390 Nygaard Oregon, WI 53575
Star Blue Below-Kopf	549 Washington Court Kewaskum, WI 53040
Jennifer Kopf	549 Washington Court Kewaskum, WI 53040
Vince Brandtner	1215 Meadowview Drive Salem Virginia 24153 (540) 797-9810
Thomas Griffing	1 Macarthur Place, Suite 800 Santa Ana, CA 92702 (714) 662-9832
Gerhard Veldman	1500 Indiana Street Salem, Virginia 24153 (540) 266-2015

Joseph Grant	4201 Moss Creek Court Matthews, North Carolina 28105 (704) 583-8736
Arthur G. "Gray" Beauchamp	Kineticorp 6070 Greenwood Plaza Boulevard Suite 200 Greenwood, Colorado 80111 (303) 733-1888
Jeffrey B. Wheeler	Vector Scientific, Inc. 4620 Technology Drive, Unit 600 Golden, Colorado 80403 (303) 697-9975
Janyna M. Mercado, PhD	19430 Camino Ridge San Antonio, Texas 78258 (210) 860-9755
Kacy Turner	Research & Planning Consultants, L.P. 6300 La Calma Drive, Suite 170 Austin, Texas 78752 (512) 371-8000
Brian D. Piper, Ph.D.	Research & Planning Consultants, L.P. 6300 La Calma Drive, Suite 170 Austin, Texas 78752 (512) 371-8000

Defendants may present the following witnesses if the need arises.

Name	Address
Dr. Jerry Halsten	800 E. 28 <sup>th</sup> Street Abbott Northwestern Campus Minneapolis, Minnesota 55407 (612) 863-6015
Custodian of Records Wisconsin State Patrol	Wisconsin State Patrol 23928 Lester McMullen Drive Tomah, WI 54660-5376 (608) 374-0513
Custodian of Records Social Security Administration	Office of Central Operations 6100 Wabash Avenue Baltimore, Maryland 21215
Custodian of Records Rhine Auto, Inc.	W5695 Garton Road Plymouth, Wisconsin 53073 (920) 876-2279
Custodian of Records American Auto Iron & Metal, Inc.	W6811 County Road 000 Fond Du Lac, Wisconsin 54937 (920) 923-6602
Custodian of Records	769 Market Street

Butch's Repairs	Oregon, WI 53575 (608) 835-5931
Custodian of Records Christen Brothers Service	55 Bowlavard Avenue Belleville, WI 53508 (608) 424-3734
Custodian of Records Prairie Land Service Center	868 Progress Way Sun Prairie, WI 53590 (608) 837-7309
Custodian of Records Schoepp Motors, Inc.	3010 Parmenter St. Middleton, WI 53562 (608) 255-7003
Custodian of Records Huston Motors, Inc.	19510 U.S. Highway 27 Lake Wales, Florida 33853 (863) 676-0595
Custodian of Records Central Pontiac Buick GMS	Central Pontiac Buick GMC Wonter Haven, Florida (863) 299-1221
Custodian of Records Dean Clinic – St. Mary's Hospital	700 S. Park Street Madison, Wisconsin 53715
Custodian of Records Dean Clinic Health Systems	P.O. Box 259840 Madison, Wisconsin 53725
Custodian of Records Dane County Circuit Courts	Dane County Courthouse, Room 1005 215 South Hamilton Street Madison, Wisconsin 53703 (608) 266-4331

Defendants designate the following witnesses whose testimony Defendants expect to present by deposition.

Pursuant to Rule 26(a)(3)(A)(ii), Defendants designate the following witnesses whose testimony Defendants expect to present by deposition. Defendants are filing, contemporaneously with these disclosures, a transcript of each deposition along with Defendants' Deposition Designations which identifies the pertinent parts of each witness's testimony that may be presented.

Name	Address
Scott Stoffel	605 Scott Street Oregon, WI 53575
Officer Chad Thompson	Wisconsin State Patrol 23928 Lester McMullen Drive Tomah, WI 54660-5376 (608) 374-0513

Defendants identify the following documents and other exhibits that Defendants may offer if the need arises.

Pursuant to Rule 26(a)(3)(A)(iii) and the Court's Procedures Governing Final Pretrial Submissions and Conference, Defendants hereby incorporate by reference Defendants' Exhibit List that was filed and submitted to the Court on January 27, 2017.

Respectfully Submitted,

**KASDORF, LEWIS & SWIETLIK, S.C.**

Attorneys for Defendants,  
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**CERTIFICATE OF SERVICE**

I certify that, in accordance with the Federal Rules of Civil Procedure, a true and correct copy of the foregoing document was served upon all counsel of record on the 27th day of January 2017.

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